

UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN

---

IN RE  
Joseph R Jefferson and Markita M Jefferson  
  
Debtors.

Chapter: 13  
  
Case No. 11-36919-SVK

---

**STIPULATION REGARDING MOTION OF WELLS FARGO BANK, N.A. FOR RELIEF FROM  
THE AUTOMATIC STAY AND ABANDONMENT**

---

The debtor, by the attorneys at, Debt Advisors, SC, and Wells Fargo Bank, N.A., its successors and/or assignees (hereinafter 'the movant'), by its attorneys, Gray & Associates, L.L.P., stipulate and agree as follows:

1. The movant holds a promissory note and a mortgage encumbering the debtor's real property located at 11124 W Daphne St Milwaukee, WI 53224-5025. The debtor has failed to make monthly mortgage payments required by said note and mortgage in a timely manner. Said default in payments has caused the movant to file a motion for relief from the automatic stay herein dated February 13, 2012. The post-petition arrearage at that time was \$8,092.30.
2. That the movant may file a supplemental claim for the post-petition arrearage which exists through the end of March 29, 2012 in the amount of \$8,092.30.

Drafted by:

Brian D. Perhach  
Gray & Associates, L.L.P.  
16345 West Glendale Drive  
New Berlin, WI 53151-2841  
Phone: (414) 224-8404  
Fax: (414) 224-1279  
Email: bperhach@gray-law.com

Gray & Associates, L.L.P. is attempting to collect a debt and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

The arrearage is itemized as follows:

12/1/11 through 3/1/12	\$9,688.40
4 mortgage payments @ \$2,422.10	
Attorney Fees and Costs	826.00
Payment received 3/29/2012	<u>(2,422.10)</u>
TOTAL ARREARAGE	<u>\$8,092.30</u>

3. That commencing in April, 2012, and continuing through to the end of September, 2012, the debtor shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the 16th day of each month in which each such payment is due. In the event any such payment is not received in a timely manner, counsel for the movant may submit an affidavit of default and proposed order for immediate relief from the automatic stay to the court for signature.

4. That commencing in October, 2012, the debtor shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the 16th day of each month in which each such payment is due. In the event any such payment is not received in a timely manner, counsel for the movant may request by letter another hearing upon the motion for relief from the automatic stay.

5. That with respect to the motion for abandonment, the trustee shall and hereby does abandon the estate's interest in the property though the trustee's right to claim any surplus proceeds if the property is sold is hereby specifically reserved.

6. That pending further notice, the amount of the monthly mortgage payment is \$2,422.10 and payments shall be made to the movant at Wells Fargo Bank, N.A., 1 Home Campus, Attention: Payment Processing, MAC# x2302-04c, Des Moines, IA 50328.

7. That the court approve the terms of this stipulation and make them an order of the court.

Dated this 30<sup>th</sup> day of March, 2012

Debt Advisors, SC  
Attorneys for Debtor

By: /s/  
Chad L. Schomburg

Dated this 29<sup>th</sup> day of March, 2012

Gray & Associates, L.L.P.  
Attorneys for Movant

By: /s/  
Brian D. Perhach

NO OBJECTION

Dated this 30<sup>th</sup> day of March, 2012

/s/ Jack Zaharopoulos  
Mary B. Grossman  
Chapter 13 Trustee